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April 15, 1999

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Via UPS OVERNIGHT

Michelle Cutler-Jones, Esq. **Assistant Regional Counsel** U.S. Environmental Protection Agency Office of Environmental Stewardship One Congress Street – Suite 1100(SES) Boston, Massachusetts 02114-2023

> EPA's CERCLA Section 104(e) Request for Information of January, 1999 Re:

Peterson/Puritan, Inc. Superfund Site - Operable Unit 2 - J.M. Mills Landfill

Our Client: CCL Custom Manufacturing, Inc.

Our File No.: 574-9042

Dear Ms. Cutler-Jones:

Enclosed is a copy of CCL Custom Manufacturing, Inc.'s phase two 104(e) response, with the Goditt & Boyer invoices attached. A copy of this response was also e-mailed to you today.

On Thursday April 15, 1999 I spoke with you on behalf of CCL Custom Manufacturing, Inc., advising that my client was still in the process of preparing exhibits "B" and "C" of the phase two 104(e) response, which are the Waste Survey form and the Waste Stream Flow Chart. After discussing my request for additional time, EPA has granted CCL Custom Manufacturing,

LESTER SCHWAB KATZ & DWYER

Michelle Cutler-Jones, Esq. February 12, 1999 Page 2

Inc. an extension of time up to, through and including Friday April 23, 1999 to provide these two remaining exhibits to its phase two response.

On behalf of my client, I wish to advise you that CCL Custom Manufacturing, Inc. takes EPA's request most seriously, and has been working diligently in an effort to respond completely and unambiguously.

Again, I thank you for the courtesy you have extended.

ery truly youns,

JONATHAN A. MURPHY

JAM:jd\219326

PETERSON/PURITAN SUPERFUND SITE - OPERABLE UNIT TWO

PHASE TWO RESPONSE OF CCL CUSTOM MANUFACTURING, INC.

APRIL15, 1999

INFORMATION REQUEST QUESTIONS

3. <u>Information About Others:</u>

a. If you have information concerning the operation of the Site or the source, content or quantity of materials placed/disposed at the Site that is not included in the information you have already provided, provide all such information.

Respondent has learned that the owner/operator of the J.M. Mills landfill was Joseph Marszalkowski. Respondent understands that Mr. Marszalkowski is now deceased. Otherwise, at the present time Respondent has no other information other than as provided in its phase one and phase two 104(e) responses. Respondent reserves the right to supplement this response should additional requested information become available.

b. If not already included in your response, if you have reason to believe that there may be persons able to provide a more detailed or complete response to any of these questions or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have.

Respondent has no other information other than as provided in its phase one and phase two 104(e) responses. Respondent reserves the right to supplement this response should additional requested information become available.

c. If not already provided, identify all persons, including Respondent's current and former employees, who have knowledge or information about the generation, use, purchase, treatment, storage, disposal, placement or other handling of materials at, or transportation of materials to, the Site.

Richard LaRouche, a current employee of CCL Custom Manufacturing, Inc., has knowledge of one unique delivery of preproduction empty (clean) cans to the J.M. Mills landfill. On one occasion only, during the period in question, on an occasion when the Martin Street plant had received numerous pallets of empty cans that had arrived with inaccurate printing/lithography, and at the direction of the customer, CCL was told to dispose of these cans. CCL had a tractor-trailer deliver these clean, empty cans to the J.M. Mills landfill for disposal. The cans were never in contact with any chemicals or product while at the plant. This was a one-time incident. Otherwise, all other waste – to Respondent's knowledge – was hauled by Goditt & Boyer to locations selected by them, and Respondent has no first hand knowledge of where Goditt & Boyer hauled such waste.

4. <u>Compliance with This Request:</u>

- a. Describe all sources reviewed or consulted in responding to this request, including but not limited to:
- i. the names of all individuals consulted;
- ii. the current job title and job description of each individual consulted;
- iii. the job title and job description during the period being investigated of each individual consulted;
- iv. whether each individual consulted is a current or past employee of Respondent;
- v. the names of all divisions of Respondent for which records were reviewed;
- vi. the nature of all documents reviewed; and
- vii. the locations where those documents reviewed were kept prior to review; and
- viii. the location where those documents reviewed are currently kept.

(i), (ii), (iii) and (iv). The following individuals were consulted:

- Jim Michalenka current employee now employed as MIS manager and prior to that position as a technical director– previously employed as a plant lab chemist during the period in question.
- Elaine Bricault current employee has been a plant lab chemist for her entire period of employment including during the period in question.
- John Paquette current employee now employed as assistant compounding manager (mixing product) previously employed in various compounding department positions during the period in question.

- Bill Discuillo current employee now employed as inventory control manager previously employed as a line worker and later in palletizing and quality control during the period in question.
- Robert Pelletier current employee now employed in building maintenance department previously employed in the same position during the period in question.
- Michael Dussault current employee now employed as warehouseman in the chemical warehouse – previously employed in the chemical warehouse during the period in question.
- Frank McClarnon current employee now employed as a warehouseman in the filled goods and component parts warehouse previously employed in the same position during the period in question.
- John Aguiar current employee now employed as a packaging specialist retooling production line equipment for new products previously employed as a line mechanic and later as a line maintenance supervisor and manager during the period in question.
- Barry Erickson current employee now employed as a processing specialist setting test batches of product previously employed in the compounding department during the period in question.
- Cindy Chalmers current employee now employed in customer production scheduling previously employed as a line worker, later line quality control, and later shift supervisor during the period in question.
- Maria Moreira current employee now employed as a supervisor on the production line previously employed as a production line worker and later supervisor during the period in question.
- Terry Cargil current employee now employed as a supervisor on the production line previously employed as a supervisor on the production line, and in quality control, during the period in question.
- Mike Crossley current employee now employed in the engineering department working on packaging issues previously employed as a production line mechanic, and later a supervisor of mechanics during the period in question.

- Rene Latour current employee now employed as a production line mechanic previously employed as a production line worker, and later production line mechanic during the period in question.
- Robert Briere current employee now employed as a forklift operator in the warehouse previously employed as a material handler in quality control and later as a warehouseman during the period in question.
- Lou McPhail current employee now employed as specifications manager converting customer specifications into production formats previously employed as a chemical mixer, later as an inventory control manager, quality control supervisor and safety director during the period in question.
- Richard LaRouche current employee now employed as a warehouseman shipping filled goods previously employed as a material handler on the production line and later in the warehouse during the period in question.
- Patricia Papineau current employee now employed as senior purchasing agent purchasing plant raw materials previously employed as a secretary, later as a purchasing agent during the period in question.
- John Belsky current employee now employed as a supervisor in chemical warehouse previously employed as a chemical mixer and later supervisor of mixing and later warehouseman during the period in question.
- Robert Mitchell current employee now employed as a production line machine operator previously employed as a production line machine operator during the period in question.
- Ron Girard current employee now employed as supervisor coordinating unloading in warehouse previously employed as a forklift operator in warehouse during period in question.
- Ron Ragno current employee now employed as packaging manager previously employed as a cost analyst and later component inventory manager during the period in question.
- Dorothy Corry current employee now employed as a purchasing agent buying raw materials for the plant previously employed as a clerk and then expeditor in the purchasing department during the period in question.

- Arthur Antaya current employee now employed as maintenance purchasing agent buying components necessary to maintain plant equipment previously employed as a production line worker, later as a forklift operator, later as a mechanic trainee, and then as purchasing agent during the period in question.
- Peter DiBona current employee now employed as a building maintenance supervisor previously employed as a machinist and later in the building maintenance department during the period in question.
- Val Guerra current employee now employed as plant controller previously employed as a forklift operator, later as a filled goods manager, later as an office manager, and later as controller during the period in question.
- Montfort Johnsen former employee employed as vice president of research and development of Peterson/Puritan during a part of the period in question.
 - v. Records of CCL Custom Manufacturing, Inc., and the corporate minute books of Peterson/Puritan, Inc., were reviewed.
 - vi. The records reviewed were previous environmental reporting to EPA and RIDEM, operable unit one correspondence and reports, plant purchasing records, Goditt & Boyer invoices, internal plant memoranda and other miscellaneous records.
 - vii. The records reviewed, prior to review, were located in Cumberland, RI; Danville, IL; Toronto, Canada; and Rosemont, IL.
 - viii. The records are still in the locations identified in response "vii", supra.

Generator Section

5. Generation of Waste During Time of Disposal:

NOTE: All questions in this section refer to the period being investigated unless

otherwise indicated.

- b. Provide a brief description of the nature of Respondent's operations at each location including:
- i. the date such operations commenced and concluded; and
- ii. the types of work performed at each location, including but not limited to the industrial, chemical, or institutional processes undertaken at each location.

The Respondent's operations involved the custom blending and packaging of personal care and household products utilizing organic and inorganic chemical compounds and mixtures according to customer specifications. The facility began operations in December (or late) 1963.

c. If the nature or size of Respondent's operations changed over time, describe those changes and the dates they occurred.

Neither the size nor nature of the Cumberland, RI plant have changed during the relevant time period in question.

d. List the products Respondent manufactured, recycled, recovered, treated, or otherwise processed in these operations.

The Respondent manufactured a variety of name brand hairspray, deodorant, hair mousse, spray starch and shaving creams as well as rug cleaners and bathroom cleaners. A listing of the products is included in Respondent's Waste Survey form made part of this response as exhibit "B".

e. In general terms, list the types of raw materials used in Respondent's operations.

Organic alcohols, chlorinated and non-chlorinated hydrocarbon solvents, silicones, alcohol and water based resyns, starch, surfactants, talc, soaps, fragrances, glycols and dyes.

f. Provide copies of Material Safety Data Sheets (MSDS) for materials used in the Respondent's operations.

The Respondent no longer has in its possession MSDS for the period in question.

g. Describe the cleaning and maintenance of the equipment and machinery involved in these operations, including but not limited to:

To the best of Respondent's knowledge, the maintenance of equipment in the operations involved mechanical adjustment and/or replacement of parts and components.

i. the types of materials used to clean/maintain this equipment/machinery; and

To the best of Respondent's knowledge, the cleaning utilized commonly used detergent based household cleaners and alcohols; materials used to maintain the equipment were standard lubricating greases and oils.

ii. the monthly or annual quantity of each such material used.

Said quantities are currently unknown; however, none of these materials were landfilled. All such cleaning materials were either consumed during the cleaning process or disposed of down the plant's drain system.

- h. Describe the methods used to clean up spills of liquid or solid materials during Respondent's operation, including but not limited to:
 - i. the types of materials spilled in Respondent's operations;

Materials incidental to the packaging of products at the plant, as identified in the attached Waste Survey.

ii. the materials used to clean up those spills;

Water, detergents, mops and squeegees.

iii. the methods used to clean up those spills; and

Any such spilled materials were pushed into the on-site drain system.

iv. where the materials used to clean up those spills were disposed of

To the best of Respondent's knowledge, materials spilled would have been small quantities of products described in the enclosed Waste Survey; the spills were flushed with water into the on-site drain system.

i. Provide a schematic diagram or flow chart that fully describes and/or illustrates the Respondent's operations.

See the operations flow chart attached to this response as "exhibit A".

6. Respondent's Wastes and Waste Streams (including By-Products):

NOTE: All questions in this section refer to the period being investigated unless otherwise indicated.

a. Complete the enclosed "Waste Survey," checking each substance present in Respondent's wastes or by-products and providing all requested information for each substance that is checked.

See the attached Waste Survey (exhibit "B").

b. For each type of waste (including by-products) from Respondent's operations, including but not limited to all liquids, sludges, and solids, provide the following information:

- i. its physical state: See Waste Survey (Exhibit B)
- ii. its nature and chemical composition See Waste Survey (Exhibit B)
- iii. its color: Unknown, but upon information and belief, clear/colorless.
- iv. its odor Unknown, but upon information and belief consistent with the same information that would be listed on current MSDS for the same materials.
- v. the approximate monthly and annual volumes of each type of waste (using such measurements as gallons, cubic yards, pounds, etc.); and

Respondent is currently unable to quantify the approximate monthly and annual volumes of waste as requested, and continues in an effort to obtain information and data sufficient to provide this information to EPA. Respondent reserves its right to supplement, add to or otherwise amend this response as additional information and data become available to it. Respondent is able to state with certainty at this time that a certain portion of its waste was transported to two landfills: the Rhode Island Central Landfill; and, the LR&R Landfill of North Smithfield. Rl..

vi. the dates (beginning & ending) during which each type of waste was produced by Respondent's operations

Respondent is currently unable to state precisely when each type of waste was first produced by Respondent's operations, and continues in an effort to obtain information and data sufficient to provide this information to EPA. Respondent reserves its right to supplement, add to or otherwise amend this response as additional information and data become available to it. Respondent is able to state, however, the following relevant information as it relates to waste that may have been transported to various landfills:

- None of Respondent's chemical process waste and reject product waste were landfilled before 1969 – product waste went into the plant's on-site drain system, and empty cans were included with the solid non-hazardous waste stream;
- Very little (if any) of Respondent's reject product waste was landfilled after 1981, based upon commencement at the plant at that time of a procedure to segregate aerosol cans containing hazardous waste from other non hazardous waste.
- c. Provide a schematic diagram that indicates which part of Respondent's operations generated each type of waste, including but not limited to wastes generated by cleaning and maintenance of equipment and machinery and wastes resulting from spills of liquid materials.

See Waste Stream Flow Chart annexed hereto as "exhibit C".

d. Identify (see Definitions) the person(s) responsible for collecting and managing each type of waste.

During the period of time in question, no specific person had responsibility for "collecting and managing each type of waste". Waste was handled as indicated elsewhere in this response. As identified elsewhere in this response, the current environmental compliance employee is Richard Ferreira; for a brief period of time (1988 to 1991), Donna Laviolette and later Helen Jones-Quiterio handled some regulatory issues.

- e. Describe how each type of waste was collected and stored at Respondent's operation prior to disposal/recycling/sale/transport, including:
 - i. the type of container in which each type of waste was placed/stored; and

See response to item "ii", infra.

ii. where each type of waste was collected/stored.

To the best of Respondent's knowledge, solid waste (including aerosol cans) and general trash were collected in open trash containers in the production areas, with periodic transfer to dumpsters stored outside the building.

7. Respondent's Disposal/Treatment/Storage/Recycling/Sale of Waste (including By-Products)

NOTE: All questions in this section refer to the period being investigated unless otherwise indicated.

ALSO NOTE: Your response to questions in this section must refer to all locations, including but not limited to the Site, to which Respondent sent its wastes.

a. Identify (see Definitions) all individuals who currently have and those who have had responsibility for the disposal, treatment, storage, recycling, or sale of Respondent's wastes.

To the best of Respondent's knowledge during the period being investigated, no specific person had responsibility for the disposal, treatment, storage, recycling or sale of Respondent's wastes. The individual currently responsible is Richard Ferreira, who is identified in more detail *infra.*; for a brief period of time (1988 to 1991), Donna Laviolette and later Helen Jones-Quiterio handled some regulatory issues.

b. Identify (see Definitions) all individuals who currently have and those who have had knowledge of the disposal/treatment/storage/recycling/sale of Respondent's wastes.

Richard Ferreira is the individual who has knowledge of Respondent's current waste stream. Certain of Respondent's other employees identified in response numbered "4 (i) through (iv)", supra, also have some knowledge of Respondent's waste stream during the period in question – to the extent they have knowledge the facts have been made a part of this phase two 104(e) response.

c. Identify (see Definitions) all individuals who currently have and those who have had

responsibility for Respondent's environmental matters.

Richard Ferreira is currently responsible for Respondent's environmental matters; for a brief period of time (1988 to 1991), Donna Laviolette and later Helen Jones-Quiterio handled some regulatory issues.

- d. For the previous three responses, also provide each individual's:
 - i. job title;
 - ii. duties;
 - iii. dates performing those duties;
 - iv. supervisors for those duties;
 - v. current position or, if such individual is no longer employed by Respondent, the date of the individuals resignation; and
 - vi. the nature of the information possessed by such individuals concerning Respondent's waste management.

Richard Ferreira, Divisional Environmental Compliance Manager, 35 Martin Street, Cumberland, RI 02864, Phone (401) 333-4200, Ext. 223 Fax. (401) 334-4191, e-mail rferreir@LOA.COM. Mr. Ferreira has performed these duties from September 1991 to present; his supervisors for those duties were James Michalenka from September 1991 to December 1995, and Roger Gieseke from January 1996 to December 1997, and Ron Davis from January 1998 to present. Mr. Ferriera's has knowledge of Respondent's environmental compliance programs and procedures for the Cumberland facility.

e. Describe the containers used to take each type of waste from Respondent's operation, including but not limited to:

- i. the type of container (e.g. 55 gal. drum, dumpster, etc.)-, ii. the colors of the containers;
- iii. any distinctive stripes or other markings on those containers;
- iv. any labels or writing on those containers (including the content of those labels)-,
- v. whether those containers were new or used; and
- vi. if those containers were used, a description of the prior use of the containers.

To the best of Respondent's recollection for the period being investigated, waste containers were 50 yard compactor and roll-off boxes, color blue with white lettering.

f. For each type of waste describe Respondent's contracts, agreements, or other arrangements for its disposal treatment, or recycling.

To the best of Respondent's knowledge, for the period being investigated, no records exist reflecting contracts, agreements or other arrangements for waste pick up at the plant. Upon information and belief, Respondent utilized a waste hauling company, Goditt & Boyer, Inc. from 1963 to 1986, to haul certain limited portions of its waste. Specifics regarding the precise nature and volume of the waste handled by Goditt & Boyer are not yet clearly known. Respondent continues in an effort to obtain information and data sufficient to provide this information to EPA. Respondent reserves its right to supplement, add to or otherwise amend this response as additional information and data become available to it.

g. Provide copies of such contracts and other documents reflecting such agreements or arrangements.

Upon information and belief, there were no contracts with Goditt & Boyer, Inc.

h. State where Respondent sent each type of its waste for disposal, treatment, or recycling.

To the best of Respondent's knowledge, for the period being investigated the Respondent did not determine where its waste was sent. Respondent is able to state with certainty at this time that a certain portion of its waste was transported to two landfills: the Rhode Island Central Landfill; and, the LR&R Landfill of North Smithfield, Rl..

i. Identify (see Definitions) all entities and individuals who picked up waste from Respondent or who otherwise transported the waste away from Respondent's operations (these companies and individuals shall be called "Waste Carriers" for purposes of this Information Request).

To the best of Respondent's knowledge, for the period being investigated, Goditt & Boyer, Inc., Attleboro, Massachusetts, was the only waste carrier utilized.

j. If Respondent transported any of its wastes away from its operations, please so indicate and answer all questions related to "Waste Carriers" with reference to Respondent's actions and complete the enclosed "Carrier Survey" form.

Not applicable.

k. For each type of waste specify which Waste Carrier picked it up.

To Respondent's knowledge, Goditt & Boyer, Inc. was the only "Waste Carrier" utilized during the time period in question; Specifics regarding the precise nature and volume of the waste handled by Goditt & Boyer are not yet clearly known. Respondent continues in an effort to obtain information and data sufficient to provide this information to EPA. Respondent reserves its right to supplement, add to or otherwise amend this response as additional information and data become available to it.

1. For each type of waste, state how frequently each Waste Carrier picked up such waste.

Specifics regarding the frequency with which Goditt & Boyer picked up waste are not yet clearly known. The only years for which Respondent currently has Goditt & Boyer records (which are attached to this response) – October 1978 through December 1979 – indicate that twelve (12) to fifteen (15) dumpsters per month were picked up by Goditt & Boyer during that period. Respondent continues in an effort to obtain information and data sufficient to provide this information to EPA. Respondent reserves its right to supplement, add to or otherwise amend this response as additional information and data become available to it.

m. For each type of waste state the volume picked up by each Waste Carrier (per week, month, or year).

Specifics regarding the volume of each waste handled by Goditt & Boyer are not yet clearly known. Respondent continues in an effort to obtain information and data sufficient to provide this information to EPA. Respondent reserves its right to supplement, add to or otherwise amend this response as additional information and data become available to it.

n. For each type of waste state the dates (beginning & ending) such waste was picked up by each Waste Carrier.

Upon information and belief, Respondent utilized Goditt & Boyer, Inc. from 1963 to 1986, to haul certain limited portions of its waste. Respondent reserves its right to supplement, add to or otherwise amend this response as additional information and data become available to it. Respondent is able to state, however, the following relevant information as it relates to waste that may have been transported to various landfills:

 None of Respondent's chemical process waste and reject product waste were landfilled before 1969 – product waste went into the plant's on-site drain system, and empty cans were included with the solid non-hazardous waste stream;

- Very little (if any) of Respondent's reject product waste was landfilled after 1981, based upon commencement at the plant at that time of a procedure to segregate aerosol cans containing hazardous waste from other non hazardous waste.
- o. Provide copies of all documents containing information responsive to the previous seven questions.

Respondent, as stated above, does not currently possess documentation supporting its answers to the last seven questions. The information provided is from the recollections of employees, as well as from knowledge of other superfund sites Respondent has been involved in, as well as materials in the possession of RIDEM relating to the Rhode Island Central Landfill, and refers EPA to the information EPA and RIDEM have collected relating to those other sites. With respect to copies of any documents reflecting handling of waste by Goditt & Boyer, Inc., attached are copies of Goditt & Boyer invoices Respondent has been able to locate.

- p. Describe the vehicles used by each Waste Carrier to haul away each type of waste including but not limited to:
- i. the type of vehicle (e.g., flatbed truck, tanker truck, containerized dumpster truck etc.);
 - ii. names or markings on the vehicles; and
 - iii. the color of such vehicles.

Respondent does not possess specific information regarding the Goditt & Boyer vehicles. Respondent reserves its right to supplement, add to or otherwise amend this response as additional information and data become available to it.

q. Identify (see Definitions) all of **each** Waste Carrier's employees who collected Respondent's wastes.

16 0483-0052

Respondent is unaware of the identities of any of the Goditt & Boyer employees who may have collected any of Respondent's wastes. Respondent reserves its right to supplement, add to or otherwise amend this response as additional information and data become available to it.

r. Indicate the ultimate disposal/recycle /treatment location for each type of waste.

Respondent is able to state with certainty at this time that a certain portion of its waste was transported to two landfills: the Rhode Island Central Landfill; and, the LR&R Landfill of North Smithfield, Rl. Respondent reserves its right to supplement, add to or otherwise amend this response as additional information and data become available to it. As further indicated above, production process waste was flushed with water into the on-site drain system.

s. Provide all documents indicating the ultimate disposal/recycling/treatment location for each type of waste.

As indicated above, Respondent played no role in determining where Goditt & Boyer, Inc. disposed of its waste. Respondent, as further stated above, does not currently possess documentation indicating the ultimate disposal location for its waste, except that the information provided comes from the recollections of employees, as well as from knowledge of other superfund sites Respondent has been involved in, as well as materials in the possession of RIDEM relating to the Rhode Island Central Landfill, and refers EPA to the information EPA and RIDEM have collected relating to those other sites. Respondent reserves its right to supplement, add to or otherwise amend this response as additional information and data become available to it.

- t. Describe how Respondent managed pickups of each waste, including but not limited to:
 - i. the method for inventorying each type of waste;

ii. the method for requesting each type of waste to be picked up;
iii. the identity of (see Definitions) the waste carrier employee/agent contacted for pickup of each type of waste;
iv. the amount paid or the rate paid for the pickup of each type of waste;
v. the identity of (see Definitions) Respondent's employee who paid the bills; and
vi. the identity of (see Definitions) the individual (name or title) and company to whom Respondent sent the payment for pickup of each type of waste.
To the best of Respondent's knowledge, arrangements for Godditt & Boyer to pick up waste were made by phone, but Respondent does not possess specific facts indicating precisely to whom said calls were made. To the extent Respondent has facts relating to payment, they are reflected in the attached Goditt & Boyer invoices.
u. Identify (see Definitions) the individual or organization (i.e., the Respondent, the Waste Carrier, or, if neither, identify such other person) who selected the location where each of the Respondent's wastes were taken.
To Respondent's knowledge, Goditt & Boyer, Inc. selected the location(s).
v. State the basis for and provide any documents supporting the answer to the previous question.

This information provided in the response to question "7(u)", supra, is based upon general recollections of employees of Respondent, and upon Respondent's general awareness due to its involvement in another Superfund site in the area (and specifically, the Landfill Resource & Recovery site), and is not based on any records.

- w. Describe all wastes disposed by Respondent into Respondent's drains including but not limited to:
 - i. the nature and chemical composition of each type of waste;
- ii. the dates on which those wastes were disposed; the approximate quantity of those wastes disposed by month and year;
- iii. the location to which these wastes drained (e.g. on-site septic system, onsite storage tank pretreatment plant, Publicly Owned Treatment Works (POTW), etc.); and
 - iv. whether and what pretreatment was provided.

To the best of Respondent's knowledge, for the period being investigated, Respondent disposed of process water waste and sanitary waste to an on-site septic system from late 1963 to 1980. From 1980 to present, the process water/sanitary waste was disposed to a Publicly Owned Treatment Works (POTW). No specific information exists as to volume discharged.

y. For all settling tank, septic system, or pretreatment system sludges or other treatment wastes resulting from Respondent's operations, complete the enclosed Waste Survey and respond to all previous questions of this Information Request with reference to such wastes.

See attached Waste Survey.

z. If not already provided, specify the dates and circumstances when Respondent's waste was taken to the Site, and identify the companies or individuals who brought Respondent's waste to the Site. Provide all documents which support or memorialize your response.

To the best of Respondent's current knowledge, for the period being investigated, no information exists and no documentation is in the possession of the Respondent indicating whether any waste from the Respondent's facility was disposed of at the Site.

8. Respondent's Environmental Reporting:

NOTE: All questions in this section refer to the period being investigated and the, last ten years unless otherwise indicated.

a. Provide all RCRA Identification Numbers for Respondents operations

RIDO55176283

b. Identify all federal offices to which Respondent sent hazardous substances or hazardous waste information.

EPCRA Reporting Center P.O. Box 3348 Merrifield, VA 22116-3342

USEPA Region V
Pesticide & Toxics Enforcement Section (PTES)
77 W. Jackson Blvd. (DRT-8J)
Chicago, IL 60604-3507

c. State the years during which such information was sent/filed.

To the best of Respondent's knowledge, 1989 to present.

d. Identify (see Definitions) all state offices to which Respondent has sent or filed hazardous substance or hazardous waste information.

OSCAR
Department of Environmental Management
83 Park Street
Providence, RI 02903-1037

RIDEM
Division of Waste Management
291 Promenade Street
Providence, RI 02908-5767

Rhode Island Emergency Response Commission State House Room 27 Providence, RI 02903

RI Department of Labor Division of Occupational Safety 610 Manton Avenue Providence, RI 02909

RIDEM
Division of Air and Hazardous Waste
291 Promenade Street
Providence, RI 02908-5767

e. State the years during which such information was sent/filed.

To the best of Respondent's knowledge, 1987 to Present

f. List all federal and state environmental laws and regulations under which Respondent has reported to federal or state governments, including but not limited to: Toxic Substances Control Act, 15 U. S.C. §§ 2601 et seq., (TSCA); Emergency Planning and Community Right-to-Know Act, 42 U. S. C. §§ I I 0 1 et seq. (EPCRA); and the Clean Water Act (the Water Pollution Prevention and Control Act), 33 U. S.C. §§ 1251 et seq.

EPCRA, RCRA, Clean Water Act, Clean Air Act, FIFRA, ATF, TSCA, and CERCLA.

21 0483-0057

g. Identify (see Definitions) the federal and state offices to which such information was sent.

See answers to "8(b)" and "8(d)", supra.

Submitted by:

CCL Custom Manufacturing, Inc. April 15, 1999

234083

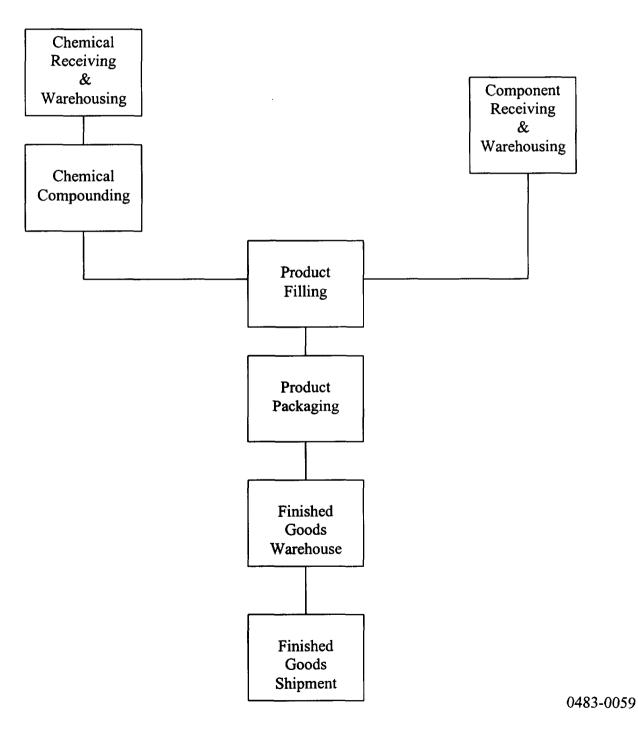
22 0483-0058

EXHIBIT A TO PHASE TWO 104(e) RESPONSE

CCL CUSTOM MANUFACTURING., INC. (Peterson/Puritan, Inc. Operable Unit Two – J.M. Mills)

Cumberland, R.I.

OPERATION FLOW CHART "1963 – 1986"





No.1 46056 GODITT & BOYER, INC. P.O. BOX 551 P.O. BOX 551 ATTLEBORO, MASS, 02703 RHODE ISLAND 724-4040

Cumberland, RI Martin St.

Peterson Puritan Aerosol

 \overline{c} MOV 29 1978 SIZE ہر NO. OF PICKUPS TERMS: 7.DAYS 1 YARD EXTRA CHARGED-TO_ EXT CK'D RICE CK'D , Circle (14.7) NO. OF CONTAINERS PICKED UP

2 YARD
4 YARD
6 YARD PICKUP RATE STATEMENT EXTRA 198 H-W TOTAL DUE BALANCE 1000 0000 -1 PICKUP CHARGE EXTRA \$16.17 16.17 TOTAL 8 YARD

Fin. Chg. 11/% Per Month Ethnis 18% Annual Rate On Unpaid Balances Over 60 Days

PAY LAST AMBUNT

0483-0060

Martin St. CHARGED TO_Cumberland, RI 02864 Puritan Aerosol Co. EXT. CK'D_ No.1 44723

GODITT & BOYER, INC.
P.O. BOX 551

ATTLEBORO, MASS. 02703

PRICE CKD

NO.1 44723

MASSACHUSETTS 222-5600

ATTLEBORO, MASS. 02703

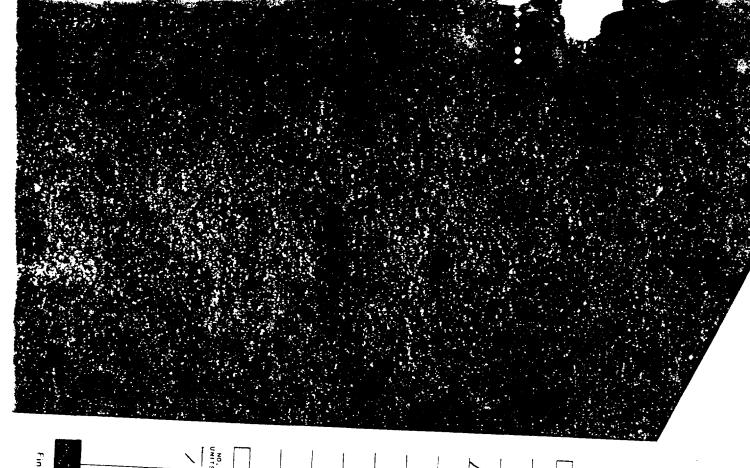
RHODE ISLAND 724-4040

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\$1402.00		270 00 1402:00	300 CC	540.00	TOTAL	1						1.		1,			8 YARD	
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Fin Chy 15% Por Mount Findle 18% Annual Rate

PAY LAST AMOUNT

0483-0061



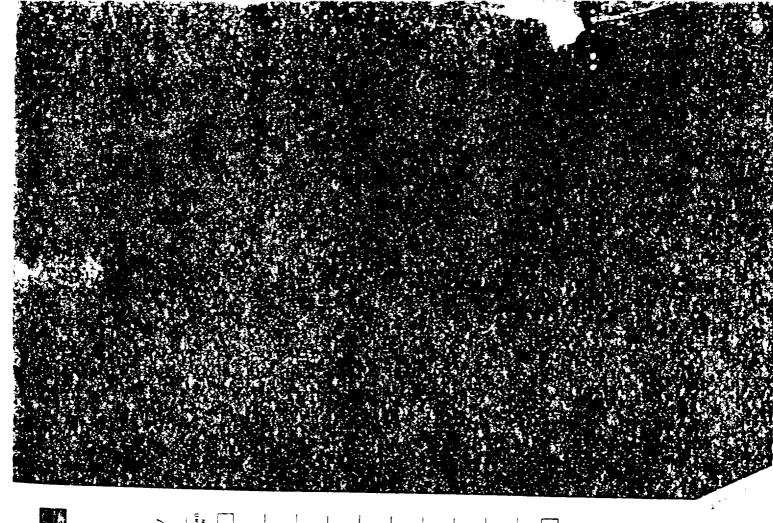
No.147558

GODITT & BOYER, INC.
P.O. BOX 551

MASSACHUSETTS 222-5600
RHODE ISLAND 724-4040

1978 CHARGED TO_ PRICE CK'D EXT. CK'D HECK NO. PICKUP BATE STATEMENT TOTAL DUE BALANCE PAY LAST AMOUNT REG. PICKUP CHARGE EXTRA 10.17 TOTAL

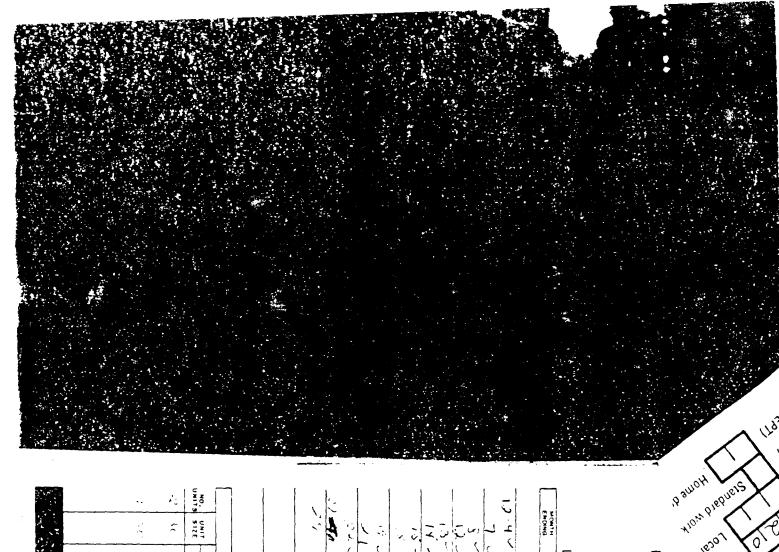
Fin. Chg. 1%% Per Month Equals 18% Annual Rate On Unpaid Balances Over 60 Days





PETERSON PURITAN AEROSOL NARTIN ST. CUMBERLAND, RI

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PO BOX 1058 PO PER, INC.
PO BOX 1058 PHODE ISLAND 724-1040 PURITAH AEROSAL CO., INC. MARTIN ST. CUMBERLAND, RI 02864

YARD

NO OF CONTAINERS PICKED UP

8 YARD

1-30

5;

15.73

JAN 8 TERMS: 7 DAYS 1979 TOTAL DUE BALANCE

REG.

EXTRA

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45 00 REG. NO. OF PICKUPS

PICKUP RATE

ERTRA

MEG.

EXTRA

TOTAL

50. 50.4.00

PICKUP CHARGE

CHRIST NOT

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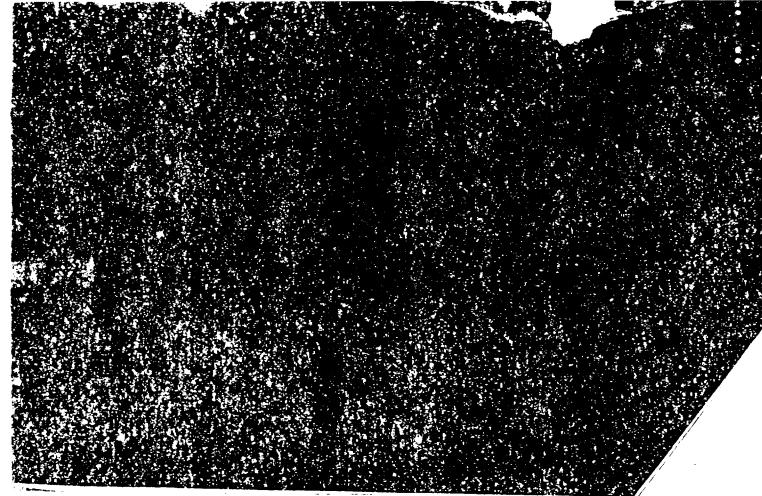
EXT. CKO

PRICE CK'D

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PAID



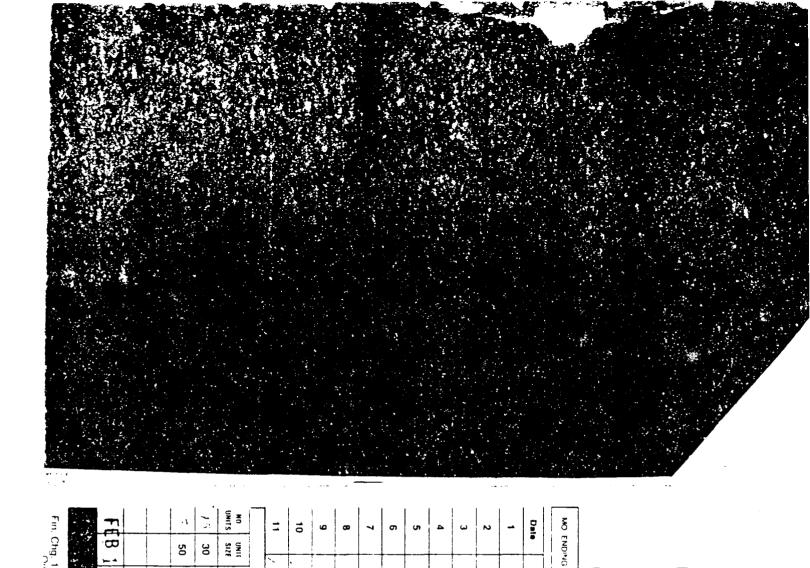


NO. 4103

GODIT & BOYER, INC.
PO BOX 1058 MASSACHUSETTS 222-5600
ATTLEBORO, MASS 02703 RHODE ISLAND 724-4040

PETERSON PURITAN AERGSOL MARTIN ST. CUMBERLAND, RI

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6

17

Date

Number of Loads

12 Date

4 3

5

5

MO ENDING

GODITT & BOYER, INC. P.O. BOX 1058 ATTLEBORO, MASS 02703 PRICE CK'D NO. 1276 MASSACHUSETTS 222-5600 ATTLEBORO, MASS 02703 PRICE CK'D

PURITAN AEROSAL CO. INC.
MARTIN ST. CHARGED TO.
CUMBERLAND, RI 02864
PAID

STATEMENT Number of Loads <u>`</u> CHECK NO. TOTAL DUE BALANCE 23 56 DUMP CHARGE TERMS: 7 DAYS Dete 3 မှ ်မ 26 24 23 25 27 Number of Loads

10

SIZE

FIRST PICKUP

EXTRA PICKUPS

TOTAL

22 21 20 19 8

30

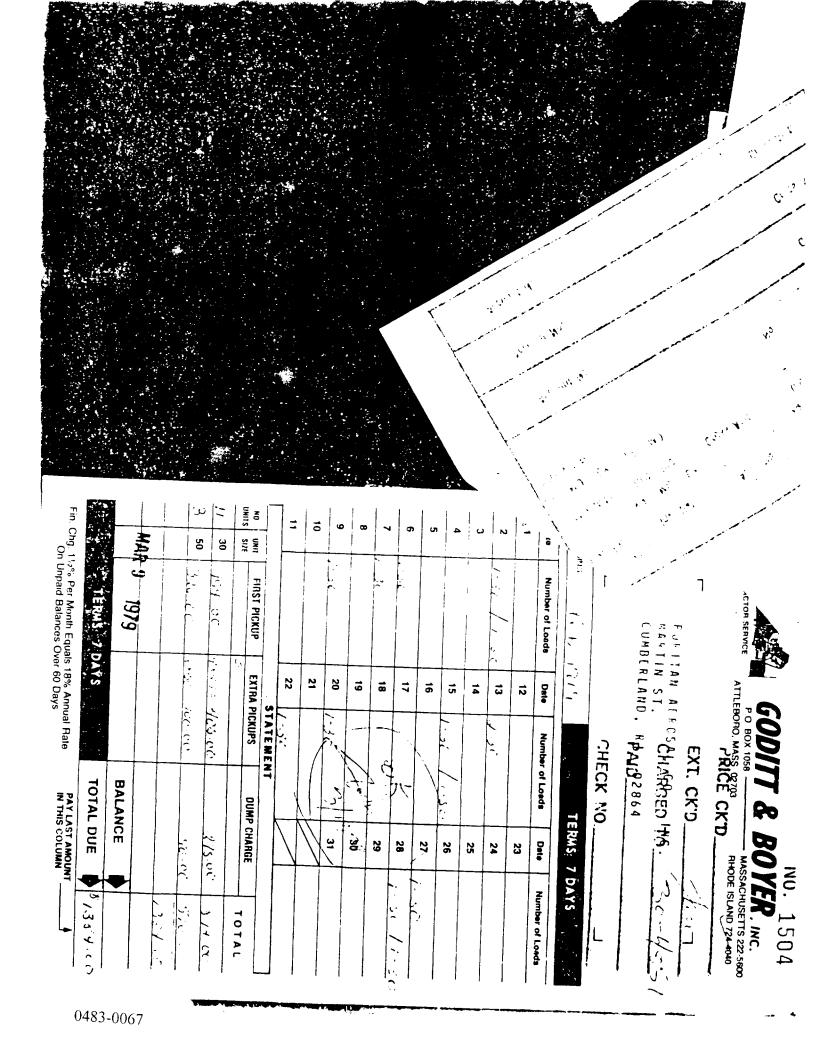
Fin. Chg. 11/5% Per Month Equals 18% Annual Rate
PAY LAST AMOUNT IN THIS COLUMN

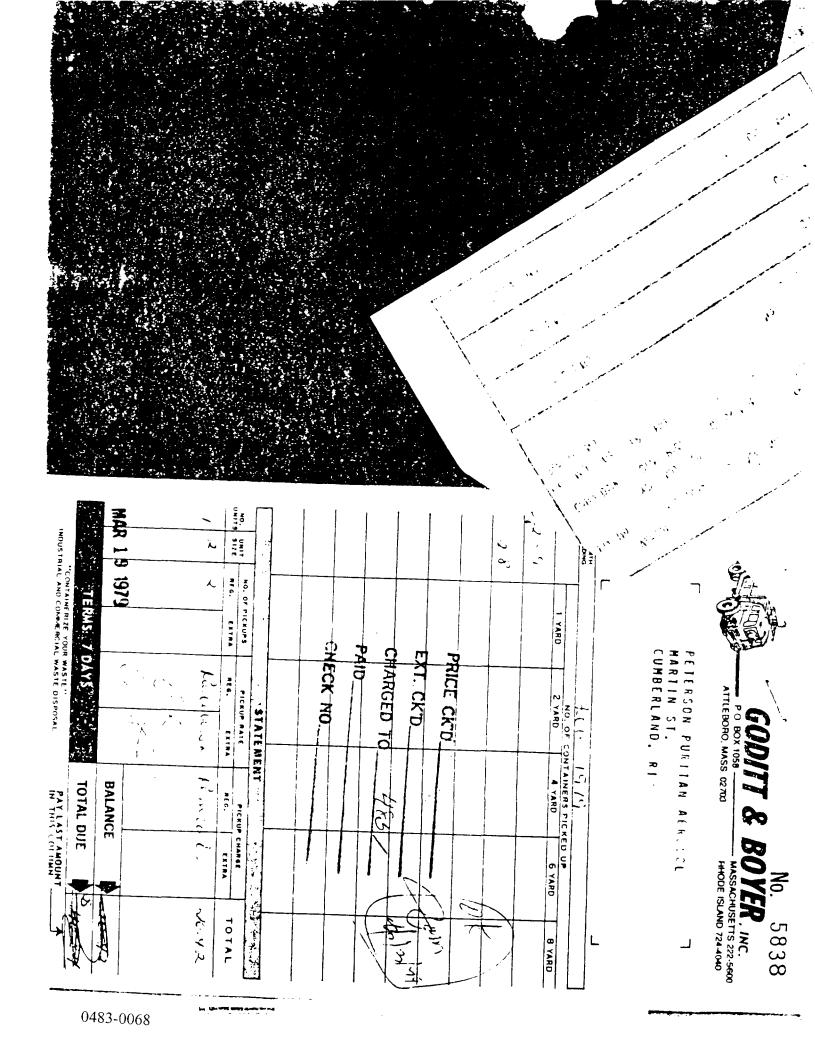
16-6-4-66

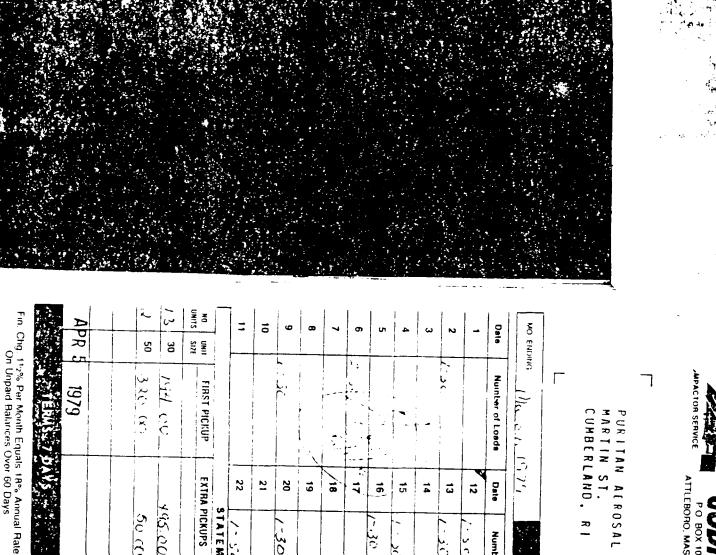
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17

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27

1.40

26 25

28

29

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1-30

GODITT & BOYER, INC.

ATTLEBORO MASS 02703

4-7.79 MASSACHUSETTS 222-5600 RHODE ISLAND 724-4040

TERMS: 7 DAYS

Date

Number of Loads

Det.

Number of Loads

7

24 స్త CUMBERLAND. MARTIN ST.

CALLED

0483-0069

BALANCE

TOTAL DUE

PAY LAST AMOUNT

EXTRA PICKUPS

DUMP CHARGE

TOTAL

03.4101 430.CC

STATEMENT

495.00

50 (6

60.00

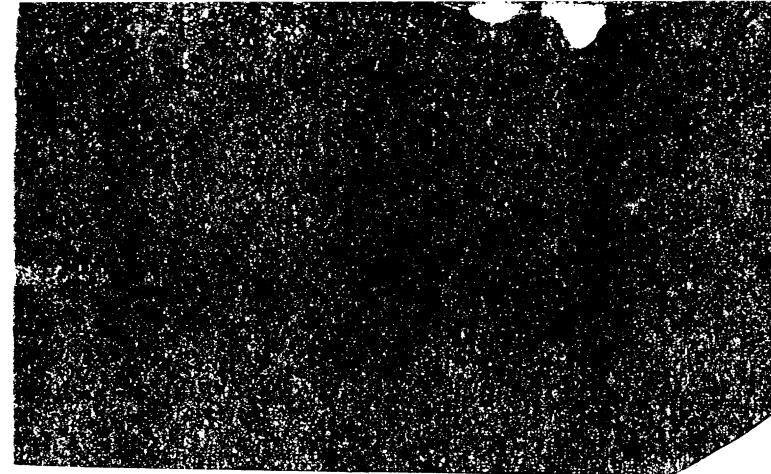
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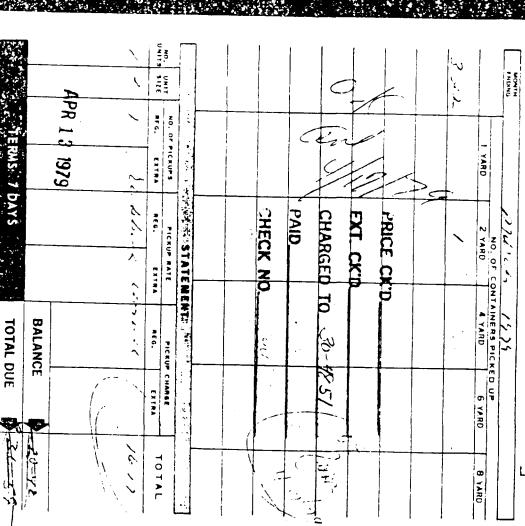
22 2 20 19 18

1.50

1-30

1.50 2-305





ATTLEBORO, MASS 02703 MASSACHUSETTS 222.5600
SS 12703
RHODE ISLAND 724-1040

PETERSON PURITAN AERCIOL MARTIN ST.

7266

0483-0070

PAY LAST AMOUNT

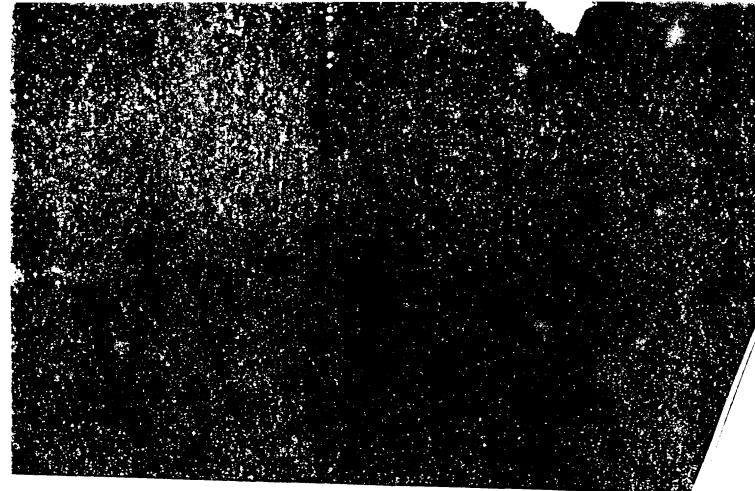




NO. 8798

GODITT & BOYER, INC.
PO' BOX 1058 MASSACHUSETTS 222-5600
ATTLEBORO, MASS. 02703 RHOODE ISLAND 724-1040

RICE CKD ATARD	Ar 12.0	ŬE.	TOTAL DUE		7 DAYS	ERMS:	7		
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NO. 2097

GODITT & BOYER, INC.
PO BOX 1058 MASSACHUSETTS 222-5600
ATTLEBORO, MASS. 02703 RHODE ISLAND 724-1040

PURITAN A ERAS ACK 60 ... INC.

CUMBERLAND CHARGEB TON 30-

	PAY LAST AMOUNT IN THIS COLUMN	PAY LA	ual Rate	: 18% Ann If 60 Davs	Fin. Chg. 15% Per Month Equals 18% Annual Rate On Unpaid Balances Over 60 Dave	Chg 13	Fin
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	25			12	1-36	ω	!
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	23		1.30	12			1
Number of Loads	Date	Number of Loads	Number	Date	Number of Loads	200	1
				1		'	



GODII

EBORO MASS 02701

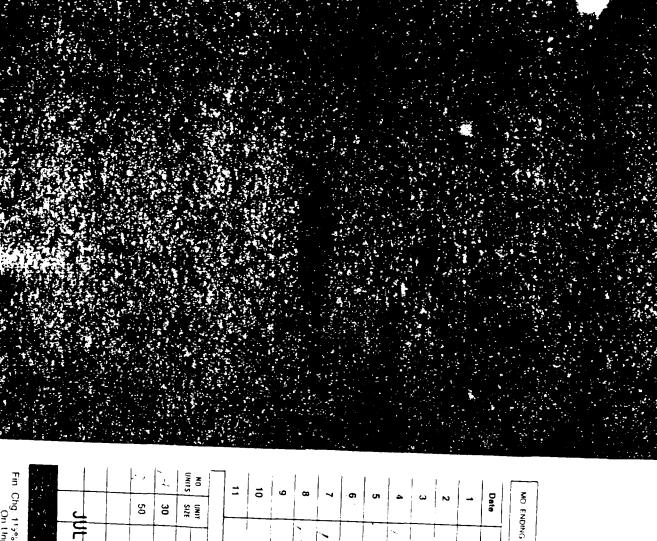
NO. 1041

MASSACHUSETTS 222-54
RHODE ISLAND 774-1040

PETERSON PURITAN AEROSOL MARTIN ST.

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				111-122		ENDING

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DAY.5.	With the	5000	540.00	EXTRA PICKUPS	STATEMENT	22	21	19	18	17	16	15 , , ,	14		12	Date Number of Loads	15.76		BERLAND RI 02864	,₹		ATTLEBORO, MASS, 02703

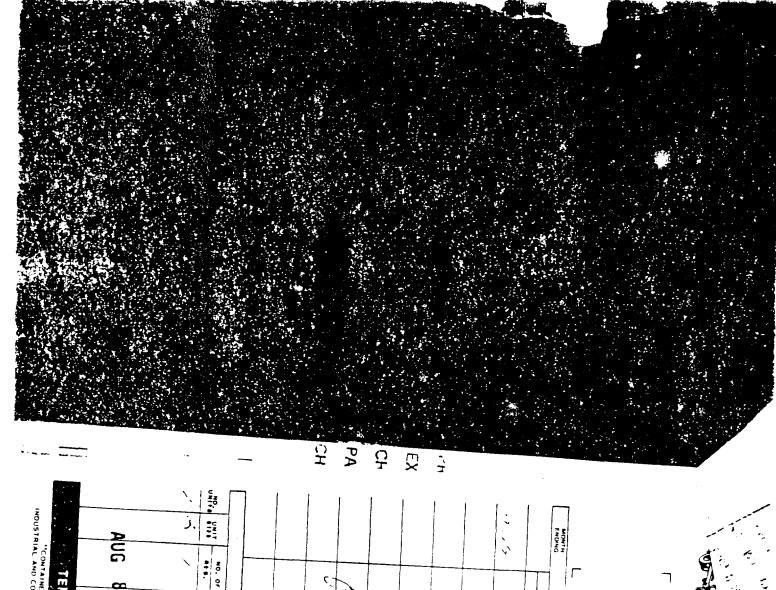


MO. 2699

GODITI & BOYER, INC.
PO ROX 1058 MASSACHUSETTS 222-5700
ATTLEFORO, MASS 02703 RHODE ISLAND 724-4040

FULLITAN ALKOSALT COKO INC.
MARTIN ST. EXT. CKO INC.
CUMBERLAND. R.L. 02864
CHARGED TO

18/5/4 B	DUE	TOTAL DUE		AYS.	TERMS 7 D	1 3 A	
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1517 01							_
1/20 /	61 00					20	ļ.
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						3	-
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	24	1-5%		13		2	1
	23)- 3°	12		-	1
Number of Loads	Date	Number of Loads	Numbe	Dete	Number of Loads	Cara	1.
DAYS	I ERMS: / DAYS	X NO					.15



PETERSON PURITAN AEROSOL MARTIN ST. CUMBERLAND, RI

TERMS JOYS

TOTAL DUE

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THOUSTRIAL AND COMMERCE TOWN MASTE DISPOSAL

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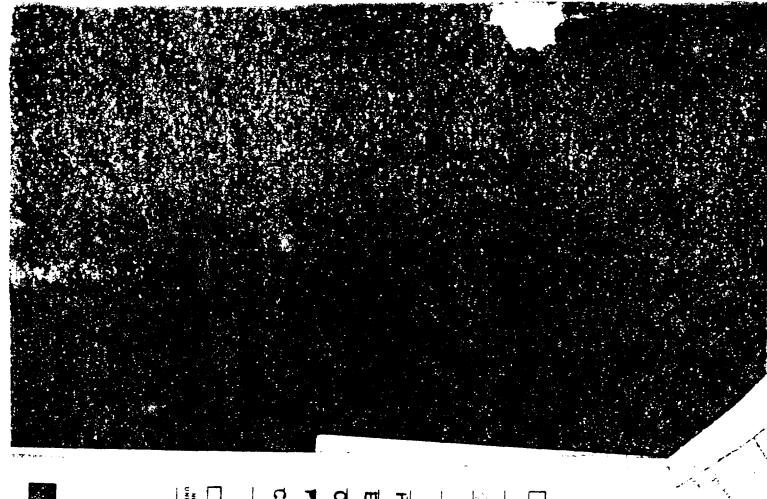
NO. 12575

ROYER, INC.

MASSACHUSETTS 222-5600

RHODE ISLAND 724-1040

0483-0076



UMBERLAND.

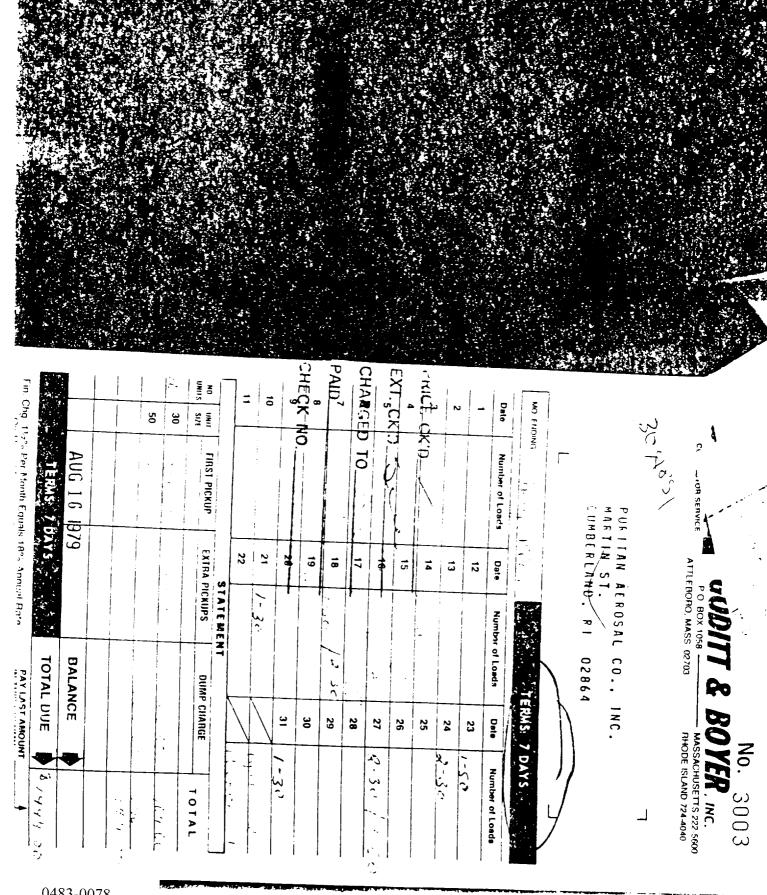
FEIERSON PURITAN AEROSOL

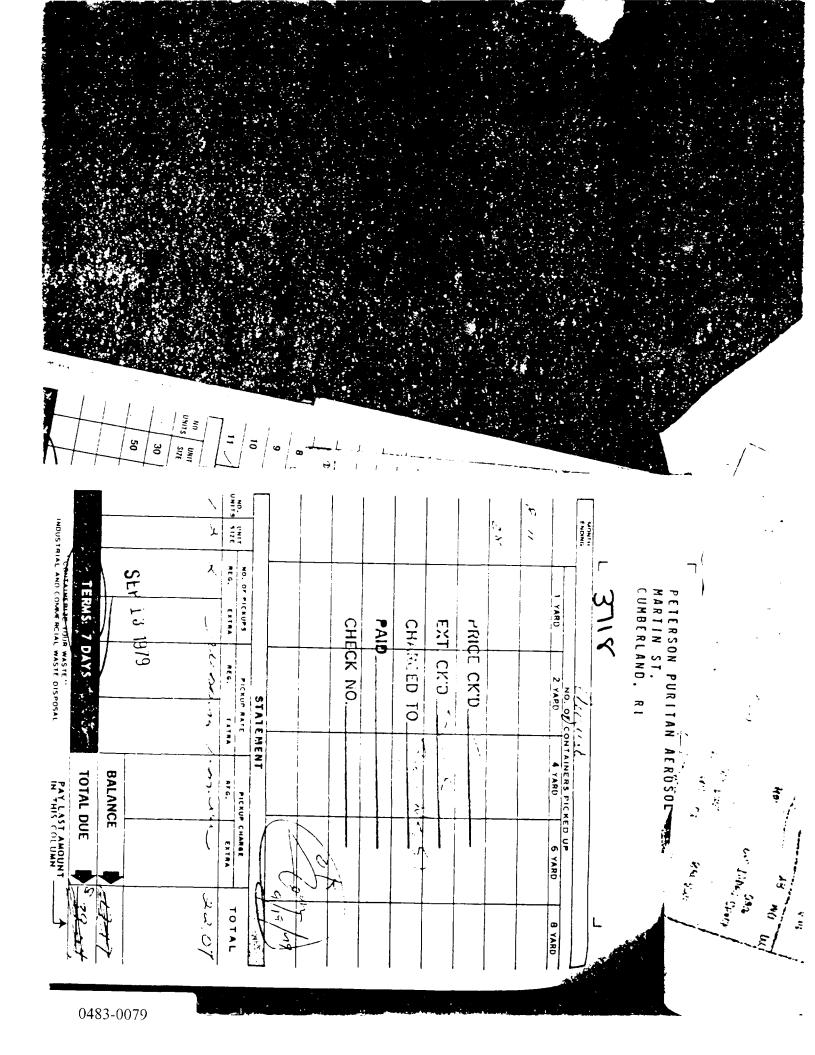
T & BOYER, INC.

MASSACHUSETTS 222-5600
PHODE ISLAND 724-4040

No.11958

PRICE CK'D MFG. 2 YARD 4 YARD 6 YARD PICKUP BATE EXTRA BALANCE TOTAL DUE REG. PICKUP CHARGE TOTAL 8 YARU







NO. 3280 GODITT & BOYER, INC. PO. BOX 1058 ATTLEBORO, MASS 02703 ATTLEBORO, MASS 02703 RHODE ISLAND 724-4040

PURITAN AEROSAL CO.. INC. MARTIN ST. CUMBERLAND. RI 02864

\	1		50	30	S SIZE	NO UNIT FIRST PICKUP		71-30	10	9	8	7 7 /	6	5	4	3	2 1.55 /1.30	_	Date Number of Loads	-
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		7				CKIIPS	STATEMENT	1-30	•	<i>1-</i> 3c				1 - 5.2.	1, 1.,		10 Z	Ļ	Number of Loads	
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	E L				COMP CHANGE	E ADCE				31	30	29	28	27	26	25	24	23	Dete	
		2			TOTAL		,					75				}	2 - 2.	1. 3.	Number of Loads	

Fin. Chg 11/5% Per Month Equals 18% Annual Rate
On Unpairl Balances Over 60 Davis

PAY LAST AMOUNT IN THIS COLUMN





FO ROX 1059 PHO MASS 02703 PHO

RHODE ISLAND 724-4040

PETERSON PURITAN AEROSOL MARTIN ST. CUMBERLAND, RI

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		-a/6,+12	9	PRICE CKD	PRI	!
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6 YARU 8 YARO	4 YARD 6	2 YARU 4	YARD			-
	DICKED ($-\lambda / \cdot \cdot \cdot \langle -\lambda \rangle$		1	ENGA?	1
				<u> </u> [7

GODIT & BOYER, INC.
PO BOX 1058
ATTLEBORO, MASS 02703
RHODE ISLAND 724-4040 r'KICE CK'D_

Puritan Aerosal Co., Inc.

Martin St.

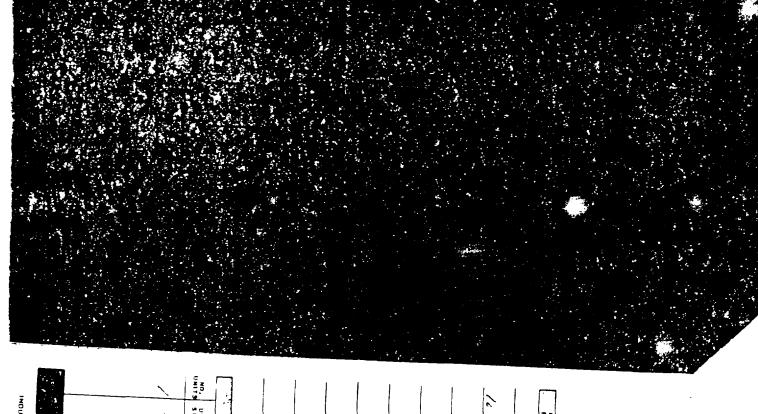
Cumberland, RI 02864

MO ENDING

Sept. 1979

		Tomo.	SAVE
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	176	500	630 ec
	T-1 - 25		19.460
	BALANCE	μ	
TERMS 7 DAYS	TOTAL DUE	JUE -	1924 192
OCT 9 On Unpaid Balances Oct 19% Annual Rate		PAY LAST AMOUNT	

0483-0082





FO BOX 1058 02 700

FETERSON PURITAN AEROSOL MARTIN ST. CUMBERLAND, RI

No. 18621

117 & BOYER, INC.

MASS 02 700 PHODE ISLAND 724-1040

INDUSTRIAL AND CHARTER HAT WASTE DISPOSAL	THEOMAC TO		à.	NO. DNIT NO. OF PICKUPS UNITS SIZE NEG. EXTRA	,			,		14 15	1 YARD	DACING WASH
	BALANCE		1 in and & to	*	STATEMENT		65 / 1011		7	`.	2 YARD 4 YARD 6	Dei 1977
RAYLASY AMOUNT	X	NOV 13 1979	: 4	PICKUP CHARGE TOTAL			1				CKED UP	L

Number of Loads

Date

Dai: 23

Number of Loads

CHECK NO.

02864

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3883

MASSACHUSETTS 222-5600 RHODE ISLAND 724-4040

P.O. BOX 1058 ATTLEBORO, MASS 07703

n Unpaid Balances Over 60 Days	173% Par Month 5	7.0	NOV 5		***		FIRST PICKUP			1:35							
18% Annual Rat. 60 Days	15	9				•	EXTRA PICKUPS	- [23	21	20	19	160	17 - 11- 32	16 · 3	-	2
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No. 4854

\$ 71764.00	TOTAL DUE	TOTA		DAYS	TERMS: 7 DAYS			
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s T	02864 4851 02864	Inc. $+$	ب	Aerosc St. und, Ru	Puritan Aerosol Martin St. Cumberland, RI			
ر ۲,	7					_	'	- /

Fin. Chg. 19% Per Month Equals 18% Annual Rate

PAY LAST AMOUNT

FO. BOX 1058 PO PER, INC. ATTLEBORO, MASS 02703 PHODE ISLAND 724-1040 No. 18400

CUMBERLAND. RI MARTIN ST. PETERSON PURITAN AEROSOL

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INDUSTRIAL AND COMMERCIAL WASTE DISPOSAL	PATAINERIZE YOUR TO AYS		EC 12 1979	1-1	NO. UNIT NO. OF PICKUPS		1	:		1 YARD
VASTE DISPOSAL	AYS			PICKUP RATE REG. EXTRA PL LLL	THE STATEMENT AND A STATEMENT		()		A TARD	No. o.
RAY HAS	TOTAL DUE	BALANCE		lust R.	EMENT	2	7712		4 YARD	DU 19
LNON		-		PICKUP CHARGE O. EXTRA REMINITION					6 YARD	PCK FD
11/4/11	D CIT			TOTAL 17.47					8 YARD	L

PAY LAST AMOUNT

TANK TO THE TENT INDUSTRIAL AND COMMERCIAL WASTE DISPOSAL 912E 12-6 DAIGN 3 JAN 17 1980 REG. TERMS: 7 DAYS EXTRA YARD रह रहताह जनस्य कलात्रीय अस्तर रहित्र क Complete and security the second CUMBERLAND. RI MARTIN ST. PETERSON PURITAN AEROSOL WINETER OF PRETRIEF 12-75 8/1/8/开 18914 2 YARD E NTILEBORO, MASS, 02703 YARD 4 YARD 6 No. 18914

GODITT & BOYER, INC.
O BOX 1058

EBORO, MASS, 02703

BHODE IS: 1058

RHODE IS: 1058 EXTRA م درد TOTAL DUE BALANCE PAY LAST AMOUNT REG. PICKUP CHARGE EXTRA 6 YARD RHODE ISLAND 724-4040 ノルアン TOTAL 8 YARD

GODITT & BOYER, INC.
P.O. BOX 1058 MASSACHUSETTS 222-5600
RHODE ISLAND 724-4040 NU. 4464

ATTLEBORO, MASS. 02703

PURITAN AEROSAL CO. INC. CUMBERLAND, RI 02864

MO. ENDING

1975

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